

California ABLE Program Trust Statement of Investment Policy

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1. PROGRAM PURPOSE

In accordance with Section 529A of the Internal Revenue Code of 1986, as amended, the California ABLE Program Trust (the “Trust”) offers a qualified ABLE program (the “Program” or “CalABLE”) to people with disabilities nationwide. The purpose of the Program is to encourage and assist individuals and families in saving private funds for the purpose of supporting individuals with disabilities to maintain health, independence, and quality of life; and to provide a tax-advantaged way to save for disability-related expenses of beneficiaries with disabilities that will supplement, but not supplant, benefits provided through private insurance, Title XVI (Supplemental Security Income) and Title XIX (Medicaid) of the Social Security Act, the beneficiary's employment, and other sources.

2. PURPOSE OF THIS STATEMENT

This Investment Policy Statement (“Policy”) defines the Program’s investment objectives and establishes policies and procedures so that investment objectives can be met in a prudent manner. This Policy is intended to:

- Articulate objectives of the Program and its investment portfolio,
- Identify roles of specific entities having fiduciary responsibility to the Program,
- Define policies regarding permitted investments, benchmarks, and asset allocation strategies, and
- Describe current investment options available to holders of individual savings accounts (“Accounts”) established as part of the Program.

3. PROGRAM OBJECTIVES

The primary goal of the Program is to provide eligible participants with investment options (“Investment Portfolios”) for investment of Accounts in the Trust that:

- Meet the various saving needs of eligible participants who are Program account owners and beneficiaries,
- Encompass a range of risk and return opportunities,
- Allow for a rate of return suitable with an appropriate level of risk to meet the investment goals of each Portfolio,
- Establish objectives for structuring investment options offered in the Program; and
- Formulate policies for selecting appropriate investment managers and the use of specific investment vehicles (“Underlying Investments”) in the Portfolios within the framework of the structure as stated in this Policy.

4. RESPONSIBILITIES

A. California ABLE Act Board

The California Achieving a Better Life Experience (ABLE) Act Board (the “CalABLE Act Board” or the “Board”) will conduct its responsibilities as a trustee and fiduciary of the Program. The Board may delegate functions that a prudent entity acting in a like capacity and familiar with those matters could properly delegate under the circumstances. The Board will exercise reasonable care, skill and caution in selecting such delegated entities and will monitor their

performance and compliance with their contractual and other obligations. All decisions made on behalf of the Program will be for the sole benefit of the Account Owners.

Under this Policy, the Board will generally be responsible for the following:

- Developing a sound and consistent Policy
- Reviewing and refining the Policy as needed
- Employing qualified investment manager(s), custodian(s), and investment advisor(s)
- Fostering diversity, equity and inclusion in all aspects of the Program
- Reviewing and approving investment proposals by the Program Manager(s), including an annual review of the Program's investment lineup
- Approving procedures for monitoring investment performance criteria and other investment related contractual obligations of the Program Manager and other vendors
- Monitoring adherence to policies, procedures, and criteria as set forth in this document and in Program Fund Monitoring Procedures and Criteria

B. Program Manager(s)

The Board has determined that it is necessary and reasonable to retain a program manager that provides professional investment management to invest the assets of the Program (the "Program Manager"). Under this Policy, the Program Manager(s) and its (their) affiliates and subcontractors will generally be responsible for the following:

- Develop Investment Portfolios appropriate to the purposes of the Program for consideration and approval by the Board, and manage those Investment Portfolios
- Overseeing Investment Portfolios and their Underlying Investments such that performance is consistent with performance criteria as shown in the Investment Performance Criteria Schedules of the Monitoring Procedures and Criteria
- Reviewing, analyzing, and making recommendations regarding the Program's investment options
- Implementing the Program's investment policies
- Providing monthly and quarterly reports as contractually obligated or directed by Law, the Board, or the Executive Director
- Provide an annual review of the Investment Portfolios and the Underlying Investments. The review should include, but not be limited to, an asset allocation review, as well as proposed changes to benchmarks and Underlying Investments

C. Investment Consultant(s)

The Board has determined that it is necessary and reasonable to retain a professional investment consultant to advise the Board with regard to the investments of the Trust (the "Investment Consultant"). Under this Policy, the Investment Consultant(s) works for the benefit of the Board and shall generally be responsible for the following:

- Providing general and/or specific investment advice to the Board and its staff
- Making recommendations on investment policies, objectives, and strategies
- Monitoring Program Managers and their investment performance in accordance with the Investment Performance Criteria Schedules of the Monitoring Procedures and Criteria
- Provide quarterly reports comparing the investment returns of the Investment Portfolios and Underlying Investments to appropriate benchmarks and peer groups

- Maintaining the list of investments on “Watch” status and provide updated reports to the Board
- Reviewing and providing recommendations regarding any investment-related items being presented to the Board by the Program Manager

5. PROGRAM POLICIES

The CalABLE Act Board will pursue the following policies to allow the Program to meet Program Objectives.

A. *Investment Objectives*

The primary goal of the Program is to provide eligible participants with a range of investment options suitable for the various savings needs and risk tolerances of eligible participants. The investment options made available to participants shall be selected and managed in accordance with fiduciary standards of care. As such, the Program taken as a whole shall seek to achieve the following objectives and considerations:

1. Meet the various savings needs of eligible participants;
2. Offer investment options which, first and foremost, are consistent with the objectives and philosophy of the Program, and within that constraint, encompass a range of expected risk and return opportunities, to allow for an expected rate of return suitable with an expected level of risk to meet the investment goals of eligible participants;
3. Offer a range of investment options that take into consideration risk tolerances, investment objectives, the age of the account owner, liquidity needs, etc.;
4. Strive to include "low-cost" funds within the Program, and in general, assess the relative operating costs of a fund against the relative benefit of utilizing that specific fund in the Program;
5. Offer investments that each exhibit a clear purpose and objective and a clear definition of success in determining whether the portfolio fulfills that purpose and meets that objective;
6. Offer investments that each have a clear, consistent and intuitive investment strategy that includes a reasonable set of assumptions about expected risks and expected returns;
7. Recognize that investment theory is often at odds with behavioral tendencies, necessitating the adoption of a disciplined investment system and specific investment goals;
8. Offer investments that have sufficient track records by which investment merit can be analyzed prior to inclusion in the Program;
9. Offer investment options that are consistent with the purpose of ABLE accounts; and
10. Strive to provide investment options with terms and choices that are easily communicated to, and understood by, eligible participants (or, where applicable, their authorized legal representatives).

B. *Permitted Investments*

There are no statutory restrictions on the types of investments that can be made by the Trust. The money in the Trust is not California state money and, therefore, not subject to the statutory and constitutional restrictions that apply to state funds. Thus, the universe of possible investment options for the Trust includes: equities (both domestic and foreign); real estate; fixed income investments (of any maturity or credit quality); commodities; FDIC-insured bank products; and any other asset class(es) utilized in the marketplace. Since all mutual fund assets are subject to the provisions of the Investment Company Act of 1940 (the “1940 Act”), the Program’s assets (excluding FDIC-insured bank products) must be managed in a manner consistent with the 1940

Act. The Board has further limited investments in the Underlying Investments of the Program to the following broad asset categories (collectively known as “Permitted Investments”):

- Domestic equities and international equities
- Fixed Income investments of varying maturities and credit quality
- Real estate commingled funds that invest in publicly traded real estate securities
- Money market instruments, cash, and money market mutual funds that are registered in the U.S. and denominated in U.S. dollars
- Investments in mutual funds, registered in the United States and denominated in U.S. dollars, with existing data in one or more nationally recognized mutual fund monitoring services, such as Morningstar and Lipper, so that comparative peer group data is available for the Board’s ongoing review
- FDIC-insured bank products

When evaluating current and potential funds and proxy voting proposals, the Board cares greatly about geopolitical and social issues as they relate to investment options offered to Program participants and the investment firms managing these portfolios and the underlying funds. The following is a partial, though not exhaustive list of such issues:

- Respect for human rights
- Respect for civil liberties
- Respect for political rights
- Discrimination based on race, sex, disability, language or social status
- Worker rights
- Environmental
- War, conflicts, and acts of terrorism

While funds will not be selected, rejected, or divested from based solely on the basis of the aforementioned factors, the Board will give serious consideration to such issues as well as a firm’s diversity, equity and inclusion characteristics and practices when reviewing and approving investments for the Program.

C. *Benchmarks*

The Board shall evaluate investment performance relative to an assigned benchmark. At the underlying fund level, benchmarks are assigned in consideration of primary fund index. These benchmarks should reflect the investment objective and risk profile of the fund. At the portfolio level, diversified benchmarks are constructed by combining these multiple indexes in custom weights that mirror the portfolio’s allocation to underlying funds.

The Program Manager shall seek to provide performance consistent with performance criteria as shown in the Investment Performance Criteria Schedules of the Monitoring Procedures and Criteria. When evaluating investment performance, a benchmark will be used to provide relative results with the following stipulations:

- Evaluations shall be against an industry standard benchmark.
- Program Investment Portfolios are to be displayed against an appropriate benchmark or policy benchmark as outlined in the Program Fund Monitoring Procedures and Criteria.
- All Underlying Investments and Investment Portfolios shall be considered against their respective benchmarks over an identical time period.

D. Banking Option

The Program has included the option for participants for a short-term investment vehicle in the form of a Demand Deposit or Savings Account (the “Banking Option”). The Banking Option will be an FDIC-insured bank account whose primary objective is the preservation and safety of the principal and the provision of a stable and low-risk rate of return. This Option allows the eligible participants the ability to execute recurring transactions with greater ease.

E. Annual Investment Review

The Program Manager shall present or shall cause a subcontractor approved by the Board to present an investment review of the Program on an annual basis or, if requested by the Board, on a more frequent basis. Such reviews shall be in a format and at a level of detail typical of reviews presented to institutional investors. They shall include, without limitation:

- 1) any proposed changes to approved benchmarks, asset allocation guidelines, permitted investment options, asset mixes, and fees;
- 2) the rationale for the proposed changes as well as the supporting documentation;
- 3) the impact on the current and proposed expected returns and risks for each Investment Portfolio under review, as well as the model inputs (i.e., capital market assumptions); and
- 4) background information for any new funds encompassed within the proposal.

Proposed changes shall be reviewed by the Investment Consultant prior to presentation to the Board. Any such changes will be subject to review and approval by the Board. Updates to all disclosure and customer documents to reflect approved changes will be reviewed and approved by the staff and as appropriate by the Board.

ADDENDUM 1

While the investment parameters for all of the Investment Portfolios offered in the Program are approved by the Board, Account Owners bear the risk of investment results derived from the selected Investment Portfolio specifically and the Program generally. The appropriate Investment Portfolio (or Portfolios) for each Account Owner is (are) a function of multiple factors, including age (of Beneficiary), personal income level, length of time before money is used, and tolerance for investment risk. A list of Funds used in each Portfolio and their respective benchmarks and asset classes may be found in Addendum 2. We also note, given these portfolios are primarily passively managed it's expected for these portfolios to perform in line with their benchmarks on a before administrative (state and program manager) fee basis, but underperform on an after fee basis.

Growth Portfolio

This Investment Portfolio seeks to provide a high long-term total return, by investing in Underlying Funds that are equity index funds. It is expected that this portfolio exhibits a high degree of volatility due to its all-equity exposure to domestic and foreign equities. Due to the corresponding high degree of risk, this Investment Portfolio may be appropriate for investors if they already have substantial savings in less volatile investments (e.g., cash and fixed-income investments), and if they have a long investment horizon and can tolerate a high level of risk (see table below).

MUTUAL FUND ASSET ALLOCATION PERCENTAGES – BY ASSET CLASS

Portfolio	Domestic Equity Funds	International Equity Funds
Growth Portfolio	65%	35%

Moderate Growth Portfolio

This Investment Portfolio seeks to provide a high long-term total return, mainly from capital appreciation, by investing in Underlying Funds that are primarily equity index funds with a modest allocation to fixed income funds. The modest allocation to fixed income securities should dampen volatility relative to an all-equity portfolio. The fund will still exhibit substantial volatility due to the high exposure to domestic and foreign equities. Due to the corresponding high degree of risk, this Investment Portfolio may be appropriate for investors if they already have substantial savings in less volatile investments (e.g., cash and fixed-income investments), and if they have a long investment horizon and they can tolerate a high level of risk (see table below).

MUTUAL FUND ASSET ALLOCATION PERCENTAGES – BY ASSET CLASS

Portfolio	Domestic Equity Funds	International Equity Funds	Fixed Income Funds
Moderate Growth Portfolio	52%	28%	20%

Conservative Growth Portfolio

The Conservative Growth Portfolio seeks moderate growth by investing in a combination of equity and fixed income Underlying Funds. The Portfolio seeks a balanced asset allocation with a modestly larger allocation to equity funds than to fixed income funds. The fund should exhibit less volatility than the Moderate Growth Portfolio but likely with a corresponding lower expected return over longer time periods. This Investment Portfolio may be appropriate for investors if they have a medium-to-long investment horizon and can tolerate a moderate level of risk (see table below).

MUTUAL FUND ASSET ALLOCATION PERCENTAGES – BY ASSET CLASS

Portfolio	Domestic Equity Funds	International Equity Funds	Fixed Income Funds
Conservative Growth Portfolio	39%	21%	40%

Balanced Portfolio

The Balanced Portfolio seeks moderate growth by investing in a combination of equity and fixed income Underlying Funds. The Portfolio seeks a balanced asset allocation and invests in equal parts for fixed income securities and equities. The fund should exhibit similar risk/return characteristics as the Conservative Growth Portfolio but at a slightly lower level of both expected risk and return. This Investment Portfolio may be appropriate for investors if they have a medium to long investment horizon and can tolerate a moderate level of risk (see table below).

MUTUAL FUND ASSET ALLOCATION PERCENTAGES – BY ASSET CLASS

Portfolio	Domestic Equity Funds	International Equity Funds	Fixed Income Funds
Balanced Portfolio	33%	17%	50%

Income and Growth Portfolio

The Income and Growth Portfolio seeks to provide a moderate rate of return by investing in a combination of equity and fixed income Underlying Funds. The Portfolio seeks a balanced asset allocation with a slightly larger portion of its assets invested in fixed income securities than equity securities. The fund should exhibit similar risk/return characteristics as the Balanced Portfolio but at a slightly lower level of both expected risk and return. This Investment Portfolio may be appropriate for investors if they have a medium to long investment horizon and can tolerate a moderate level of risk (see table below).

MUTUAL FUND ASSET ALLOCATION PERCENTAGES – BY ASSET CLASS

Portfolio	Domestic Equity Funds	International Equity Funds	Fixed Income Funds
Income and Growth Portfolio	26%	14%	60%

Conservative Portfolio

The Conservative Portfolio seeks to provide a reasonable rate of return while focusing on the preservation of capital by investing the majority of the assets in fixed income Underlying Funds with a modest allocation to equity funds. The modest allocation to equity securities should, over time, generate a higher total return relative to an all-fixed income portfolio. This Investment Portfolio may be appropriate for investors if they have a short-to-medium investment horizon and can tolerate a low-to-moderate level of risk (see table below).

MUTUAL FUND ASSET ALLOCATION PERCENTAGES – BY ASSET CLASS

Portfolio	Domestic Equity Funds	International Equity Funds	Fixed Income Funds
Conservative Portfolio	13%	7%	80%

Income Portfolio

The Income Portfolio seeks to provide a relatively low rate of return with an emphasis on capital preservation. The Portfolio invests the majority of its assets in fixed income securities, with the rest invested in money market funds. The fund should exhibit relatively stable risk/return characteristics over time. However, the fund does not guarantee price stability and can decline in value in adverse market environments including a rising interest rate environment. This Investment Portfolio may be appropriate for investors if they have a relatively short investment horizon and have a low risk tolerance (see table below).

MUTUAL FUND ASSET ALLOCATION PERCENTAGES – BY ASSET CLASS

Portfolio	Fixed Income Funds	Short Term/Cash Equivalent
Income Portfolio	80%	20%

ADDENDUM 2

The Portfolios shall contain the Funds, listed with their benchmarks, by asset class below.

<u>Underlying Mutual Funds</u>	<u>Benchmark</u>
<i>Domestic Equity</i>	
▪ Fidelity Total Market Index Fund	Dow Jones U.S. Total Stock Market Index
<i>International Equity</i>	
▪ Fidelity International Index Fund	MSCI EAFE Index
▪ Fidelity Emerging Markets Index Fund	MSCI Emerging Markets Index
<i>Fixed Income</i>	
▪ Fidelity US Bond Index Fund	Bloomberg U.S. Aggregate Bond Index
▪ Fidelity Long-Term Treasury Bond Index Fund	Bloomberg U.S. Long Treasury Bond Index
▪ Schwab Treasury Inflation Protected Securities Index Fund	Bloomberg U.S. Treasury Inflation-Linked Bond Index
▪ Vanguard Emerging Markets Bond Fund	JP Morgan EMBI Global Diversified Index
▪ Vanguard High Yield Corporate Fund	95% Bloomberg U.S. High-Yield Ba/B 2% Issuer Capped Index and 5% Bloomberg U.S. 1–5 Year Treasury Bond Index
<i>Cash</i>	
▪ Vanguard Cash Reserves Federal Money Market Fund	Lipper Institutional US Government Money Market Index